

Management Plan

PRC-MP-SH-32219

10 CFR 851 CHPRC Worker Safety and Health Program Description

Revision 3, Change 2

Published: 01/22/2019 Effective: 01/22/2019

Program: Occupational Safety and Industrial Hygiene Topic: Occupational Safety and Industrial Health

Technical Authority: Robinson, Roby Functional Manager: Knutson, Garrett

Use Type: Administrative



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• Solid Waste Operations Complex :

Categorical Exclusion: GCX-7 (Minor Change)

Screener: Geary, Daniel

• Canister Storage Building/Interim Storage Area : Categorical Exclusion: GCX-7 (Minor Change)

Screener: Covey, Lori

• Central Plateau Surveillance and Maintenance :

Categorical Exclusion: GCX-7 (Minor Change)

Screener: Waller, Mitchell

• Waste Encapsulation Storage Facility:

Categorical Exclusion: GCX-7 (Minor Change)

Screener: Covey, Lori

• 100 K Facility:

Screening Determination Performed: (Screening/Determination Performed (no issues))

0216-2018

Screener: Williams, James • Plutonium Finishing Plant :

Categorical Exclusion: GCX-7 (Minor Change)

Screener: King, Jeffry

• Transportation :

Excluded from USQ

Exclusion Reason:

N/A per Section 1.3 - < 1 A2

• 324 Facility:

Categorical Exclusion: GCX-7 (Minor Change)

Screener: Enghusen, Mark

JHA: Administrative

Periodic Review Due Date:04/18/2022

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Change Summary

Description of Change

Remove RCC activities and update Appendix A document references.

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1.0 EXECUTIVE SUMMARY

The CH2M HILL Plateau Remediation Company Worker Safety and Health Program Description identifies the elements, methods, and processes by which CH2M HILL Plateau Remediation Company (CHPRC) meets the requirements in the Title 10, Energy, Code of Federal Regulations (CFR) Part 851, Worker Safety and Health Program (Rule) published in the Federal Register Volume 71 No 27, February 9, 2006. The Rule codifies worker protection program requirements and establishes the following:

- Requirements for a worker safety and health program that will reduce or prevent occupational injuries, illnesses, and accidental losses by requiring U.S. Department of Energy (DOE) contractors to provide their employees with safe and healthy workplaces at DOE sites; and
- Procedures for investigating whether a violation of a requirement of the Rule has occurred, for determining the nature and extent of any violation, and for imposing an appropriate remedy (851.1).

In accordance with Subpart C of the Rule, CHPRC is responsible for the safety and health of CHPRC workforce (851.20), including CHPRC employees and contractors, that meet the scope and definition of "work at a DOE site in furtherance of the DOE mission," as defined in 10 CFR 851.3. CHPRC's accountability to adhere to the Rule's referenced requirements is based on the Rule's Preamble, Federal Register Volume 71 No 27, February 9, 2006, page 6896 (Column 1), which states: "The standards included in this final rule are consistent with those mandated under DOE Order 440.1A."

CHPRC has adopted other best management practices, consensus standards, and health-based values not invoked by the Rule. CHPRC is contractually obligated to encourage employees to decline to perform a task that "poses an imminent risk of death or serious physical harm..." [(851.20(b)(8)]; however, CHPRC joined the rest of the Hanford Site contractors by using a graded approach that provides workers the right to Stop Work when they feel the hazard has not been fully addressed. CHPRC reviews for adoption more recent publications of the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLV) when they are more protective.

CHPRC had established several Memoranda of Agreement (MOA) with other Hanford Site Contractors who have a key role in CHPRC's ability to meet the Rule. This meets the 851.11(a)(2)(ii) requirement to coordinate to ensure there are clear roles, responsibilities, and procedures to ensure the safety and health of workers at multi-contractor workplaces.

CHPRC has an approved Integrated Safety Management System/Environmental Management System (ISMS/EMS), PRC-MP-MS-003, *Integrated Safety Management System/Environmental Management System Description (ISMSD)*, which describes how environment, safety, health, and quality integrate into the work planning and execution for CHPRC's scope of work.

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2.0 BACKGROUND

On October 1, 2008, CHPRC began managing the Plateau Remediation Contract (DE-AC06-08RL14788) for the U.S. Department of Energy Richland Operations Office (DOE-RL). The contracted activity occurs at the Hanford Site, located near Richland, Washington, a covered workplace under 10 CFR 851.3, "a place at a DOE site where a contractor is responsible for performing work in furtherance of a DOE mission."

CHPRC completed contract deliverable C.3.2.3-1, *Adopted Worker Safety and Health Program* via letter CHPRC-0800013, Revision 2 on August 28, 2008. This deliverable is important, as it adopted the Fluor Hanford, Inc. HNF-MP-32219, *10 CFR 851 PHMC Worker Safety and Health Program Description*, Revision 3 in its entirety, including referenced documents. The Richland Operations Office responded with the letter, APPROVAL OF THE 10 CFR 851 WORKER SAFETY AND HEALTH PROGRAM, 08-SED-0208, dated September 23, 2008. This confirmed CHPRC compliance with the 851.11(b)(1), which states: "... no work may be performed at a covered workplace unless an approved worker safety and health program is in place for the workforce."

This document is consistent with and supports PRC-MP-MS-003, *Integrated Safety Management System/Environmental Management System Description (ISMSD)*.

3.0 ROLES AND RESPONSIBILITIES

3.1 General Description

The CHPRC Safety, Health, Security, and Quality (SHS&Q) support services organization is responsible for maintaining this CHPRC Worker Safety and Health Program Description (WSHPD). Within SHS&Q, Occupational Safety and Industrial Hygiene (OS&IH) is responsible for program development, implementation, and oversight. Price Anderson Amendments Act (PAAA) Event & Reporting is responsible for performing the actions associated with the PAAA program described in PRC-PRO-NS-2243, *Identification, Reporting, and Tracking of Nuclear Safety and Worker Safety and Health Requirement Noncompliances & PAAA/Worker Safety and Health Enforcement Activities*. Appendix A, *Description of Functional Areas*, provides a summary description of CHPRC organizations responsible for implementation of specific areas of the Rule. CHPRC Projects and organizations are responsible for implementing the overall worker safety and health program and appropriate integration into contracting and work planning activities.

The roles and responsibilities of organizations and personnel supporting CHPRC are described in PRC-MP-MS-003. CHPRC establishes specific roles and responsibilities for implementation of worker safety and health requirements through the document format established in the CHPRC documents identified in Appendix B, *851 Implementation Matrix*, which defines specific responsibilities for implementation of the scope of the individual document.

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3.2 Integration of Site Activities

The Hanford Site consists of three DOE Field Offices and multiple contractors, requiring integration of some worker health and safety activities. CHPRC supports the Site Wide Standards Management Plan and provides qualified resources to represent CHPRC interests on a continuing basis. Occasionally, CHPRC meets with other site contractors to address site wide issues in order to provide a consistent approach to resolutions.

Work performed by/for other contractors at the Hanford Site is controlled under a series of MOAs. Two MOAs are in place for the DOE-Prime Contractors who have a key role in CHPRC's ability to meet all the Rule's requirements.

- Mission Support Alliance, LLC, (MSA)
- Occupational Medical Service Provider (OMSP)

In general, for work authorized under the MOAs, safety will be controlled by the contractor in control of the work location.

When obtaining products or services from other Hanford Site DOE Prime Contractors through the Work Authorization fund transfers, the expectation is that DOE has approved top-level programs in health, safety, and quality (ISMS, Worker Safety and Health Program [WSHP], and Quality Assurance Program), and that these programs and documents are found acceptable to DOE and no further verification is required.

3.3 Worker Safety and Health Program Maintenance

The CHPRC SHS&Q Vice President is accountable for maintaining the WSHPD and shall approve all revisions. The WSHPD will be maintained in accordance with the Rule. An annual review will be conducted, at a minimum, to verify that the WSHP adequately reflects operations and controls. The annual review will include worker participation as defined in 851.11(d).

The WSHPD will be maintained under CHPRC configuration control and submitted for review and approval whenever a significant change or addition to the WSHP is made, when minor revisions are required, or annually.

Applicable labor organizations will be notified of any updates or changes to the program as defined in 851.11(d). This communication is initiated through Labor Relations to the Labor Organization President(s). Changes to the program are communicated to the workforce through a variety of methods (e.g., Safety Tailgate slides and the Plateau Remediation Contract Procedure System [PPS] notifications).

3.3.1 Minor Revisions

Editorial or minor process improvements that do not change context or concept will be reviewed, approved, and incorporated to the WSHPD without DOE-RL approval. Reference to these changes/revisions will be identified and communicated to the DOE-RL during the annual WSHPD review process.

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3.3.2 Major Revisions

Significant operational changes and/or issues having an impact upon approved safety and health thresholds require written DOE-RL Contracting Officer approval prior to implementation, such as:

- New contractor awarded contract,
- Contractor accepts a new work scope for a new toxic, reactive, flammable, or explosive chemical which was not addressed in the approved WSHP,
- The toxicity or explosive hazard, such as chemical storage, has increased where there is a credible accident scenario that would have an impact upon the co-located workers or off-site public, or
- A site not currently using explosives begins a project involving explosives.

3.3.3 Annual Review

In accordance with contractual requirements, submit an updated WSHPD for approval or letter stating that no changes are necessary to the currently approved plan.

3.4 Submittals under 10 CFR 851

The CHPRC SHS&Q support services organization is responsible for maintaining the CHPRC WSHPD and submittals/notifications under the Rule. The following submittals/notifications are defined in the Rule, and will be provided to DOE-RL.

3.4.1 Annual Worker Safety and Health Program Description

In accordance with contractual requirements, the WSHPD will be reviewed and submitted for DOE-RL Contracting Officer approval annually (12 months after the preceding revision date).

3.4.2 Closure Facility Hazards

In accordance with 851.21(b), CHPRC will submit to DOE-RL a list of closure facility hazards and the established controls within 90-days after identifying such hazards. Closure facility hazards are defined in 851.3, and are limited to hazards in which means of control involve deviations from the technical requirements of 851.23 and would require costly and extensive structural/engineering modifications to be in compliance.

3.4.3 Requests for Interpretative Ruling

The DOE Office of General Counsel is the sole authority that can provide binding interpretations of the Rule. The DOE Office of Health, Safety & Security can provide technical information on implementation and enforcement guidance. CHPRC will provide courtesy notification to DOE-RL of any requests for interpretation.

3.4.4 Requests for Variance

The Rule's Subpart D defines the process for requesting a Variance, and will be used when requesting Temporary, Permanent, and National Defense Variances. CHPRC will inform DOE-RL of the need for a variance and submit the request for variance to the Cognizant Secretarial Officer.

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3.4.5 Self-Identification and Tracking System

CHPRC will use the DOE voluntary Noncompliance Tracking System (NTS) and the guidelines provided in the Enforcement Process Overview to report any noncompliance. CHPRC will use the existing Condition Reporting & Resolution System for non-NTS reportable 10 CFR 851 noncompliances.

4.0 PROGRAM DESCRIPTIONS

CHPRC has an established safety and health program based on CHPRC contract requirements and the Rule. Key CHPRC documents are listed in Section 5.0.

The overall WSHP supports the functional areas established in the Rule and provides the environment for a place of employment that is free from recognized hazards that are causing or have the potential to cause death or serious physical harm to workers (851.10(a)). CHPRC has separate, non-regulatory commitments to worker ownership and partnership in safety and health, as defined in the 47 Federal Register (FR) 29025, *Voluntary Protection Programs (VPP)*.

Appendix A, *Descriptions of "Worker Safety and Health Functional Areas,"* provides a summary description of each area required to support implementation of the Rule's Subpart C.

Appendix, B, 851 Implementation Matrix, identifies documents and processes for performing CHPRC activities to be in compliance with the Rule's requirements.

Appendix C, Contractor Safety and Health, provides a summary of the processes used to ensure CHPRC contracted work scope is performed in accordance with the WSHPD.

5.0 IMPLEMENTING DOCUMENTS

PRC-MP-MS-003, Integrated Safety Management System/Environmental Management System Description.

PRC-MP-QA-599, Quality Assurance Program Description

PRC-MP-AC-40500, Acquisition Management Plan

RL-0040, Nuclear Facility Deactivation and Decommissioning Remainder of Hanford Project Execution Plan

6.0 SOURCES

6.1 Requirements

10 CFR 851, Worker Safety and Health Program

6.2 References

47 Federal Register (FR) 29025, Voluntary Protection Programs

American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices (TLV) book

DE-AC06-08RL14788, Plateau Remediation Contract

DOE G 440.1-8, Implementation Guide for use with 10 CFR PART 851, Worker Safety and Health Program

DOE 851, Frequently Asked Questions

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HNF-MP-32219, 10 CFR 851 PHMC Worker Safety and Health Program Description
Letter from D.A. Brockman and J. C. Connerly to J. G. Lehew, APPROVAL OF THE 10 CFR
851 WORKER SAFETY AND HEALTH PROGRAM, 08-SED-0208, dated September 23,
2008

Letter: CHPRC-1102133, Memorandum of Agreement Number MOA-CSC-CHPRC-2011, Rev. 0, between the OMSP and CH2M HILL Plateau Remediation Company

Letter: CHPRC-0800013, Revision 2 on August 28, 2008, Adopted Worker Safety and Health Program

MOA-00002, Rev. 1, Memorandum of Agreement for the Performance of Payment of Services Between Mission Support Alliance, LLC, and CH2M HILL Plateau Remediation Company, March 24, 2011

NFPA-70 National Electric Code

NFPA-70E Standard for Electrical Safety in the Workplace

PRC-MP-MS-003, Integrated Safety Management System/Environmental Management System Description

PRC-MP-AC-40500, Acquisition Management Plan

PRC-PRO-AC-40471, Contract Labor Resources

PRC-PRO-NS-2243, Identification, Reporting, and Tracking of Nuclear Safety and Worker Safety and Health Requirement Noncompliance's & PAAA/Worker Safety and Health Enforcement Activities

PRC-MP-QA-599, Quality Assurance Program Description

RL-0040, Nuclear Facility Deactivation and Decommissioning Remainder of Hanford Project Execution Plan

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Appendix A - Descriptions of "Worker Safety and Health Functional Areas"

(10 CFR 851 Appendix A)

The methods to ensure implementation of the Functional Areas are briefly summarized below. The Functional Areas strategy is based on guidance from DOE G 440.1-8, *Implementation Guide for use with 10 CFR PART 851, Worker Safety and Health Program* and the DOE 851, *Frequently Asked Questions* web site established by the Office of Environment, Safety & Health at: https://www.energy.gov/ehss/downloads/10-cfr-851-worker-safety-and-health-program-frequently-asked-questions

1.0 CONSTRUCTION SAFETY

<u>APPLICABLE</u>. CHPRC complies with the 10 CFR 851.23 mandated construction safety laws, codes, standards, and regulations relating to construction safety, and ensures that all reasonable steps are taken to set and communicate expectations and enforce requirements for subcontractor safety performance.

- Construction means combination of erection, installation, assembly, demolition, or fabrication activities involved to create a new facility or to alter, add to, rehabilitate, dismantle, or remove an existing facility. It also includes the alteration and repair (including dredging, excavating, and painting) of buildings, structures, or other real property, as well as any construction, demolition, and excavation activities conducted as part of environmental restoration or remediation efforts (10 CFR 851.3(a) - Definitions).
- Construction contractor means the lowest tiered contractor with primary responsibility for the
 execution of all construction work described within a construction procurement or
 authorization document (e.g., construction contract, work order). (10 CFR 851.3(a)
 Definitions).
- Construction contractor is responsible for identifying a designated representative on the worksite during periods of active construction, and assigning competent persons (where required by the Occupational Safety and Health Administration [OSHA]).
- Construction safety management and oversight ensures compliance with mandated codes and standards. Specific implementation methods are identified in Appendix B, 851 Implementation Matrix.
- CHPRC work planning processes ensure that activities occurring in a non-construction environment trigger the appropriate construction standard requirements.

2.0 FIRE PROTECTION

<u>LIMITED APPLICABILITY</u>. A portion of this section does not apply to CHPRC, as the contract directs this government furnished service through another DOE-RL contracted organization. MSA's Hanford Fire Department (HFD) provides 10 CFR 851 related Fire Protection services. The HFD organization is broken into three divisions.

• **Operations Division** is responsible for fire suppression, hazardous materials response, emergency medical response, and special rescue support activities.

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- Fire Systems Testing and Maintenance Division is responsible for the functional testing, inspection and preventive and repair maintenance activities for Hanford Site fire alarm and suppression systems to meet National Fire Protection Association (NFPA) and DOE standards and requirements. In addition, this element performs annual inspection of site fire extinguishers, provides emergency response backup for suppression, ambulance, and hazardous materials response support, and maintains all firefighter training certifications.
- The Fire Prevention Division is managed by the Hanford Site Fire Marshal and is responsible for all fire prevention activities, including the building tour and inspection program.

CHPRC maintains a staff of Fire Protection Engineers to ensure the design and maintenance of fire protection systems meet the Rule's requirements. Specific implementation methods are identified in Appendix B, 851 Implementation Matrix.

3.0 EXPLOSIVES SAFETY

<u>APPLICABLE</u>. CHPRC complies with 851.23 mandated Explosives Safety laws, codes, standards, and regulations relating to explosives safety. CHPRC Projects activities infrequently use explosives as part of well decommissioning, demolition activities, and construction activities. All acquisition, storage, and use of explosives are in accordance with MSA's HFD and Safeguard & Security processes. Specific implementation methods are identified in Appendix B, 851 Implementation Matrix.

4.0 PRESSURE SAFETY

APPLICABLE. CHPRC complies with 851.23 mandated safety and health laws, codes, standards, and regulations relating to maintenance and operation of pressure vessels. The DOE-RL is designated as the "jurisdictional authority" for Pressure Vessels. The Jurisdictional Authority interpretations are to be kept on file. Any variances or exemptions pursued in the future that are beyond the Jurisdictional Authority's scope and authority, as defined in American Society of Mechanical Engineers (ASME) Boiler Pressure Code series, will be pursued through CHPRC Prime Contracts and managed as exemptions or variances to DOE requirements. Specific implementation methods are identified in Appendix B, 851 Implementation Matrix.

5.0 FIREARMS SAFETY

<u>NOT APPLICABLE</u>. The CHPRC contracted work scope directs this government furnished service through another DOE-RL contracted organization. MSA's Security related Protective Forces, and Animal Control, provides services that require firearms.

6.0 INDUSTRIAL HYGIENE

<u>APPLICABLE</u>. CHPRC complies with 851.23 contractually mandated safety and health laws, codes, and standards relating to industrial hygiene. Appendix B, 851 Implementation Matrix identifies applicable requirements and implementation processes. CHPRC reviews for adoption more recent publications of the ACGIH TLVs when they are more protective.

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7.0 BIOLOGICAL SAFETY

NOT APPLICABLE. CHPRC contracted work scope does not include hazards requiring the formation of an Institutional Biosafety Committee or equivalent as defined in 10 CFR 851 Appendix A, Section 7.

8.0 OCCUPATIONAL MEDICINE

<u>LIMITED APPLICABILITY</u>. CHPRC obtains occupational medicine services as a government furnished service through another DOE-RL contracted organization and their subcontractors. At Hanford, the OMSP is responsible to establish an 851 Appendix A, subparagraph 8, compliant and comprehensive occupational medicine program for workers employed at CHPRC that work on a DOE site for more than 30 days in a 12-month period or are enrolled for any length of time in a required medical or exposure monitoring program.

All CHPRC employees, contractors and their lower tiered on-site subcontractors are to use the OMSP for medical services including medical examinations, first aid treatment, employee assistance program, and return to work evaluations. See Appendix C for further discussion. HFD provides ambulance service for urgent situations requiring care and transport.

CHPRC provides the OMSP access to hazard information by promoting adequate communication, coordination, and sharing among operating and safety organizations. CHPRC provides access to current information about actual or potential work-related hazards, employee job tasks, hazard analysis information, actual or potential worksite exposures, and employee essential job functions.

CHPRC provides the OMSP access to the workplace for evaluation of job conditions and issues relating to worker's health. CHPRC provides the opportunity and has established a forum for OMSP staff to participate in worker safety and health team meetings and committees. Workplace evaluations and meetings include the President's Zero Accident Council (PZAC), case management meetings, emergency preparedness planning, and project-specific wellness and injury reduction activities.

Under the OMSP's management, employee medical, psychological, and Employee Assistance Program (EAP), records are kept confidential and protected. Access to medical records is provided in accordance with DOE regulations implementing the Privacy Act and the *Energy Employees Occupational Illness Compensations Program Act*.

9.0 MOTOR VEHICLE SAFETY

<u>APPLICABLE</u>. CHPRC complies with 10 CFR 851.23 mandated occupational safety laws, codes, standards, and regulations relating to motor vehicle safety. Appendix B, *851 Implementation Matrix*, identifies applicable requirements and implementation processes.

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10.0 ELECTRICAL SAFETY

APPLICABLE. CHPRC complies with 851.23 mandated safety laws, codes, standards, and regulations relating to maintenance and operation of an electrical safety program. CHPRC and DOE-RL have established a process within the CHPRC to identify an Authority Having Jurisdiction (AHJ) for the NFPA Electrical Standards, NFPA-70, National Electric Code, for design and installation; and an AHJ for NFPA-70E, Standard for Electrical Safety in the Workplace, electrical safe work practices. Both AHJ have authority for interpretations and equivalencies in regards to the NFPA-70 and the NFPA-70E. The AHJ is identified to DOE-RL outside of the WSHP under a separate letter. Interpretations for safe electrical design and installation are kept by the Hanford Electrical Codes Board. Board interpretations for safe electrical work practices are kept by the Hanford Workplace Electrical Safety Board. Any variances or exemptions pursued in the future that are beyond the AHJ's scope and authority, as defined in National Electrical Code (NEC) or other NFPA documents, will be pursued through CHPRC Prime Contracts and managed as exemptions or variances to DOE requirements. Specific implementation methods are identified in Appendix B, 851 Implementation Matrix.

11.0 NANOTECHNOLOGY SAFETY (RESERVED)

No information is provided as the Rule has "Reserved" this section for future use.

12.0 WORKPLACE VIOLENCE PREVENTION (RESERVED)

No information is provided as the Rule has "Reserved" this section for future use.

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Appendix B - 851 Implementation Matrix

Rule Section		CHPRC Management System Documents/Process	
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
851.20	Management responsibilities and worker rights and responsibilities		
		PRC-MP-MS-19361	CH2M HILL Plateau Remediation Company Project Execution Plan
		PRC-MP-EP-40220	Environmental Program and Strategic Planning Roles, Responsibilities, and Functions
		PRC-MP-QA-599	Quality Assurance Program
		PRC-PRO-SH-40078	Contractor Safety Processes
851.20(a)	Management responsibilities	PRC-MP-TQ-011	CH2M HILL Plateau Remediation Company (CHPRC) Qualification and Training Plan
		PRC-PRO-WKM-12115	Work Management
		PRC-PRO-SH-7085	Safety Responsibilities
		PRC-PRO-AC-40471	Contract Labor Resources
		PRC-PRO-AC-40493	Contracting for Construction or Fabrication
		PRC-PRO-AC-40496	Managed Task Services
	Establish policy, goals, and objectives	PRC-POL-SH-5053	CHPRC Safety, Health, Security, Quality, and Environmental Policy
851.20(a)(1)		PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
		PRC-MP-MS-19361	CH2M HILL Plateau Remediation Company Project Execution Plan
		PRC-PRO-SH-40078	Contractor Safety Processes
		PRC-PRO-SH-7085	Safety Responsibilities
	Use qualified	PRC-PRO-HR-021	Staffing
851.20(a)(2)	staff	PRC-MP-MS-003	Integrated Safety Management System/Environmental

Rule Section		CHPRC Managemer	nt System Documents/Process
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
			Management System Description (ISMSD)
		PRC-POL-TQ-11337	Employee Training
		Special Provision SP-5	On Site Services
		PRC-PRO-SH-40078	Contractor Safety Processes
		PRC-MP-TQ-011	CH2M HILL Plateau Remediation Company (CHPRC) Qualification and Training Plan
		PRC-PRO-HR-033	Employee Discipline
851.20(a)(3)	Hold personnel accountable	PRC-PRO-SH-7085	Safety Responsibilities
		PRC-PRO-HR-050	Managing Employee Performance
	Involve workers	PRC-POL-SH-5053	CHPRC Safety, Health, Security, Quality and Environmental Policy
851.20(a)(4)		PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
		PRC-PRO-SH-7085	Safety Responsibilities
		PRC-CHRT-SH-9982	President's Zero Accident Council
		PRC-PRO-WKM-12115	Work Management
		PRC-PRO-SH-40078	Contractor Safety Processes
851.20(a)(5)	Provide workers access to information	PRC-PRO-SH-7085	Safety Responsibilities
		DOE-0343	Stop Work
		PRC-PRO-WKM-079	Job Hazard Analysis
851.20(a)(6)	Establish procedures for	DOE-0400	Hanford Site-Wide Employee Concerns Program
, , , ,	worker reporting	PRC-PRO-SH-7085	Safety Responsibilities
		PRC-CHRT-SH-9982	President's Zero Accident Council
		PRC-CHRT-SH-40512	Employee Zero Accident Council
	Respond	DOE-0343	Stop Work
851.20(a)(7)	promptly to worker reports	DOE-0400	Hanford Site-Wide Employee Concerns Program

Rule Section		CHPRC Management	System Documents/Process
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
		PRC-PRO-SH-7085	Safety Responsibilities
		PRC-PRO-SH-40461	Safety Communications
		PRC-CHRT-SH-9982	President's Zero Accident Council
051 20(a)(9)	Communicate	PRC-CHRT-SH-40512	Employee Zero Accident Council
851.20(a)(8)	regularly with workers	PRC-PRO-SH-7085	Safety Responsibilities
		Special Provision SP-5	On Site Services
		PRC-PRO-SH-40078	Contractor Safety Processes
	Catabliah atau	DOE-0400	Hanford Site-Wide Employee Concerns Program
851.20(a)(9)	Establish stop work	DOE-0343	Stop Work
, , , ,	procedures	PRC-PRO-WKM-12115	Work Management
		Special Provision SP-5	On Site Services
	Inform workers of their rights	PRC-PRO-SH-40461	Safety Communications
851.20(a)(10)		Course: 000006	CHPRC - General Employee Training (CGET)
		PRC-PRO-SH-7085	Safety Responsibilities
851.20(b)	Worker rights and responsibilities	PRC-POL-SH-5053	CHPRC Safety, Health, Security, Quality, and Environmental Policy
		PRC-PRO-SH-40078	Contractor Safety Processes
		PRC-PRO-SH-7085	Safety Responsibilities
851.20(b)(1)	Participate in activities on official time	2013 Labor Agreement	2013 Labor Agreement Between CH2M HILL Plateau Remediation Company (CHPRC) and Hanford Atomic Metal Trades Council (HAMTC) AFL-CIO
		CHPRC Intranet Site Map	Electronic Library/DOE RL Directives
851.20(b)(2)	Have access to safety and health documents	www.hss.energy.gov	DOE-HQ Office of Health, Safety and Security
, , , ,		CHPRC Virtual Manual (OS&IH)	Occupational Safety & Health Intranet Web Page
		PRC-PRO-SH-40461	Safety Communications

Rule	Section	CHPRC Management	System Documents/Process
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
851.20(b)(3)	Be notified of overexposures	PRC-PRO-SH-409	Industrial Hygiene Monitoring, Reporting and Records Management
		PRC-PRO-SH-7085	Safety Responsibilities
851.20(b)(4)	Observe	PRC-PRO-SH-40461	Safety Communications
031.20(0)(4)	monitoring	PRC-PRO-SH-7085	Safety Responsibilities
		PRC-PRO-SH-7085	Safety Responsibilities
851.20(b)(5)	Accompany DOE officials on inspections	2013 Labor Agreement	2013 Labor Agreement Between CH2M HILL Plateau Remediation Company (CHPRC) and Hanford Atomic Metal Trades Council (HAMTC) AFL-CIO
851.20(b)(6)	Request results of inspections and investigations	PRC-PRO-SH-7085	Safety Responsibilities
	Express concerns related to H&S	DOE-0400	Hanford Site-Wide Employee Concerns Program
851.20(b)(7)		PRC-PRO-SH-7085	Safety Responsibilities
		Special Provision SP-5	On Site Services
054 00/h\/0\	Decline tasks	DOE-0343	Stop Work
851.20(b)(8)	posing imminent danger	PRC-PRO-SH-7085	Safety Responsibilities
		DOE-0343	Stop Work
054 00/h)/0)	Stop imminently	PRC-PRO-SH-7085	Safety Responsibilities
851.20(b)(9)	dangerous work	Special Provision SP-5	On Site Services
		PRC-PRO-SH-40078	Contractor Safety Processes
851.21	Hazard identification and assessment		
851.21(a)	Establish procedures to identify hazards	PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
	and assess risks	PRC-PRO-WKM-12115	Work Management
		PRC-PRO-SH-40410	Hazard Communication Program

Rule Section		CHPRC Management System Documents/Process	
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
		DOE-0342	Hanford Site Chronic Beryllium Disease Prevention Program (CBDPP)
		MSC-RD-8589	Hanford Fire Marshal Permits
		PRC-PRO-SH-17916	Industrial Hygiene Exposure Assessments
		PRC-PRO-SH-40078	Contractor Safety Processes
		PRC-STD-SH-40518	Personal Protection
		PRC-PRO-WKM-079	Job Hazard Analysis
851.21(a)(1)	Assess workers exposures	PRC-PRO-SH-409	Industrial Hygiene Monitoring, Reporting and Records Management
		PRC-PRO-SH-17916	Industrial Hygiene Exposure Assessments
		PRC-MP-QA-599	Quality Assurance Program Description
		PRC-PRO-SH-409	Industrial Hygiene Monitoring, Reporting and Records Management
		PRC-STD-SH-40518	Personal Protection
054.04(a)(0)	Document hazard assessment	PRC-PRO-SH-52755	Employee Job Task Analysis
851.21(a)(2)		PRC-PRO-SH-17916	Industrial Hygiene Exposure Assessments
		PRC-PRO-WKM-079	Job Hazard Analysis
		MSC-RD-8589	Hanford Fire Marshal Permits
		DOE-0359	Hanford Site Electrical Safety Program (HSESP)
851.21(a)(3)	Record results	PRC-PRO-SH-409	Industrial Hygiene Monitoring, Reporting and Records Management
	Analyze designs	PRC-STD-FP-40404	Fire Protection Program
851.21(a)(4)	for potential hazards	PRC-RD-EN-1819	CHPRC Engineering Requirements

Rule	Section	CHPRC Management	System Documents/Process
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	Evaluate	PRC-PRO-WKM-079	Job Hazard Analysis
851.21(a)(5)	operations, procedures, and	PRC-PRO-EN-2001	Facility Modification Package Process
	facilities	PRC-CHRT-WKM-53060	Hazard Review Board
		PRC-PRO-SH-17916	Industrial Hygiene Exposure Assessments
054 04(a)(6)	Perform activity-	PRC-PRO-WKM-079	Job Hazard Analysis
851.21(a)(6)	level hazard analysis	PRC-PRO-WKM-12115	Work Management
		DOE-0359	Hanford Site Electrical Safety Program (HSESP)
		PRC-PRO-MS-067	Lessons Learned
		PRC-PRO-WKM-079	Job Hazard Analysis
051 21(0)(7)	Review safety and health experience	PRC-PRO-SH-40461	Safety Communications
851.21(a)(7)		PRC-CHRT-MS-40017	Safety Analysis Center Charter
		PRC-CHRT-SH-9982	President's Zero Accident Council
		PRC-CHRT-SH-40512	Employee Zero Accident Council
851.21(a)(8)	Consider interaction with other hazards, such as radiological hazards	PRC-PRO-WKM-079	Job Hazard Analysis
851.21 (b)	Submit list of closure facility hazards to Head of DOE	Letter: CHPRC-080086A R1, Transmittal of 10 CFR 851 "Worker Safety and Health Program Description", attachment 3	CHPRC Closure Facilities with Closure Facility Hazards List
	Field Element	PRC-PRO-SH-32621	Closure Facility Hazard
		PRC-STD-FP-40404	Fire Protection Program
851.21(c)	Obtain baseline	PRC-PRO-SH-17916	Industrial Hygiene Exposure Assessments
		PRC-PRO-SH-40499	Safety and Health Inspections
851.22	Hazard prevention and abatement		

Rule Section		CHPRC Management System Documents/Process	
Section Number	Section Subject	Document Number (Current revision)	Document Title[i]
		PRC-PRO-WKM-079	Job Hazard Analysis
	Establish and	PRC-PRO-SH-40516	Chemical Management Program
	implement a	PRC-PRO-SH-40499	Safety and Health Inspections
851.22(a)	hazard prevention and	PRC-PRO-FP-40421	Hot Work
	abatement	PRC-CHRT-SH-9982	President's Zero Accident Council
	process	PRC-STD-FP-40404	Fire Protection Program
		PRC-PRO-SH-40078	Contractor Safety Processes
		PRC-PRO-WKM-079	Job Hazard Analysis
	Incorporate	PRC-PRO-WKM-12115	Work Management
851.22(a)(1)	controls into facility designs and procedure	PRC-RD-EN-1819	CHPRC Engineering Requirements
		PRC-PRO-EN-2001	Facility Modification Package Process
		PRC-PRO-WKM-079	Job Hazard Analysis
	Prioritize	PRC-STD-SH-40518	Personal Protection
851.22(a)(2)	abatement actions according to worker risks	PRC-POL-SH-5053	CHPRC Safety, Health, Security, Quality, and Environmental Policy
		PRC-PRO-WKM-12115	Work Management
		PRC-PRO-SH-40078	Contractor Safety Processes
	Select hazard controls based	PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
851.22(b)	on standard	PRC-PRO-WKM-079	Job Hazard Analysis
	hierarchy of controls	PRC-STD-SH-40518	Personal Protection
		PRC-PRO-SH-40410	Hazard Communication Program
		PRC-PRO-SH-40078	Contractor Safety Processes
851.22(b)(1)	Substitution of the hazard	PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
	trie riazaru	PRC-PRO-WKM-079	Job Hazard Analysis
		PRC-PRO-SH-40410	Hazard Communication Program

Rule Section		CHPRC Management	t System Documents/Process
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		PRC-STD-SH-40518	Personal Protection
		PRC-RD-EN-1819	CHPRC Engineering Requirements
		PRC-STD-SH-40518	Personal Protection
851.22(b)(2)	Engineering controls	PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
		PRC-PRO-WKM-079	Job Hazard Analysis
		PRC-PRO-SH-40410	Hazard Communication Program
		PRC-STD-SH-40518	Personal Protection
851.22(b)(3)	Work practices and administrative	PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
		PRC-PRO-WKM-079	Job Hazard Analysis
		PRC-PRO-WKM-12115	Work Management
		PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
	Personal	PRC-PRO-WKM-079	Job Hazard Analysis
851.22(b)(4)	protective equipment	PRC-STD-SH-40518	Personal Protection
		DOE-0352	Hanford Site Respiratory Protection Program (HSRPP)
		DOE-0359	Hanford Site Electrical Safety Program (HSESP)
	Address	DOE-0352	Hanford Site Respiratory Protection Program (HSRPP)
	hazards when selecting or	PRC-PRO-AC-40478	Procurement of Materials
851.22(c)	purchasing	PRC-PRO-AC-40471	Contract Labor Resources
	equipment, products, or services	PRC-PRO-AC-40493	Contracting for Construction or Fabrication
		PRC-PRO-AC-40496	Managed Task Services

Rule	Section	CHPRC Management System Documents/Process	
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		PRC-PRO-SH-40078	Contractor Safety Processes
		Special Provision SP-5	On Site Services
851.23	Workplace safety and health standards		
		PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
		MSC-PLN-WP-41080	Hanford Integrated Standards Management Plan
		PRC-PRO-SH-409	Industrial Hygiene Monitoring, Reporting and Records Management
		DOE-0359	Hanford Site Electrical Safety Program (HSESP)
		PRC-PRO-MN-19304	Periodic Maintenance Process
	Comply with standards	PRC-MP-MN-40443	Nuclear Maintenance Management Program (NMMP) Description Document
851.23 (a) & (b)	applicable to hazards in their workplaces	CHPRC-03907	10 CFR 851 TECHNICAL AMENDMENT ABATEMENT PLAN
		DOE-0352	Hanford Site Respiratory Protection Program (HSRPP)
		PRC-MP-TQ-011	CH2M HILL Plateau Remediation Company (CHPRC) Qualification and Training Plan
		PRC-PRO-SH-7085	Safety Responsibilities
		DOE-0342	Hanford Site Chronic Beryllium Disease Prevention Program (CBDPP)
		PRC-PRO-SH-077	Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events
		Special Provision SP-5	On Site Services

Rule	Section	CHPRC Management	t System Documents/Process
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851.24	Functional areas		
		PRC-PRO-WKM-12115	Work Management
	Have a	PRC-MP-MS-003	Integrated Safety Management System/Environmental Management System Description (ISMSD)
851.24 (a), (b)	structured approach to Safety and Health program that covers functional areas listed in App. A.	PRC Procedure System	Virtual Manuals- Occupational Safety & Health, Fire Protection, Construction, Safeguards and Security, Training and Qualification, Work Management and Employee Concerns.
		DOE-0336	Hanford Site Lockout/Tagout Procedure
		DOE-0359	Hanford Site Electrical Safety Program
		DOE-RL-92-36	Hanford Site Hoisting and Rigging Manual
851.25	Training and information		
		PRC-POL-TQ-11337	Employee Training
		PRC-MP-TQ-011	CH2M HILL Plateau Remediation Company (CHPRC) Qualification and Training Plan
		PRC-PRO-TQ-40164	Personnel Training and Qualification
054.05 (5)	Ensure that all workers are trained on the	PRC-PRO-TQ-164	Integrated Training Electronic Matrix
851.25 (a)	hazards to	PRC-PRO-SH-52755	Employee Job Task Analysis
	which they are exposed	PRC-PRO-WKM-079	Job Hazard Analysis
		PRC-PRO-SH-40498	Toxic Metals Exposure Control
		PRC-PRO-SH-40479	Occupational Noise Exposure and Hearing Conservation
		DOE-0352	Hanford Site Respiratory Protection Program

Rule Section		CHPRC Management System Documents/Process	
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		DOE-0342	Hanford Site Chronic Beryllium Disease Prevention Program
		PRC-PRO-SH-40078	Contractor Safety Processes
054.05 (1)(4)	Provide training for new workers	PRC-PRO-TQ-164	Integrated Training Electronic Matrix
851.25 (b)(1)	before or at the time of initial assignment	PRC-PRO-TQ-40164	Personnel Training and Qualification
851.25 (b)(2)	Provide periodic training as needed	PRC-PRO-TQ-40164	Personnel Training and Qualification
		SDD J3-18	Site Training Services/HAMMER
	Provide training about new hazards	PRC-PRO-TQ-164	Integrated Training Electronic Matrix
851.25 (b)(3)		PRC-PRO-SH-52755	Employee Job Task Analysis
		PRC-PRO-TQ-40164	Personnel Training and Qualification
		PRC-PRO-WKM-079	Job Hazard Analysis
	Train workers who have safety & health program responsibilities	PRC-PRO-TQ-40164	Personnel Training and Qualification
851.25 (c)		PRC-STD-TQ-40369	Occupational Safety and Industrial Hygiene Training Program Description
		Special Provision SP-5	On Site Services
851.26	Recordkeeping and reporting		
		SDD J3-67	Federal Records Inventory and Schedule Mgmt.
	Establish and	PRC-PRO-SH-40499	Safety and Health Inspections
851.26 (a)(1)	maintain complete safety and health	PRC-PRO-SH-409	Industrial Hygiene Monitoring, Reporting and Records Management
	records	PRC-PRO-SH-40479	Occupational Noise Exposure and Hearing Conservation
		PRC-PRO-IRM-10588	Records Management Processes

Rule Section		CHPRC Management System Documents/Process	
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851.26 (a)(2)	Record and report injuries and illnesses accurately	PRC-PRO-SH-077	Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events
		PRC-PRO-SH-40078	Contractor Safety Processes
		Special Provision SP-5	On Site Services
851.26 (a)(3)	Comply with all applicable recordkeeping	PRC-PRO-SH-077	Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events
	requirements	PRC-PRO-SH-52755	Employee Job Task Analysis
851.26 (b)(1)	Report and investigate accidents, injuries and illness	PRC-PRO-SH-077	Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events
		PRC-PRO-SH-40078	Contractor Safety Processes
	Analyze related	PRC-PRO-QA-24741	Performance Analysis Process
851.26 (b)(2)	data for trends and lessons learned	PRC-CHRT-MS-40017	Safety Analysis Center Charter
		PRC-PRO-QA-052	Issues Management
	Reference Sources	PRC-RD-EN-1819	CHPRC Engineering Requirements
		PRC-STD-FP-40404	Fire Protection Program
851.27 (b)(1- 10)		DOE-0359	Hanford Site Electrical Safety Program (HSESP)
		PRC-PRO-EM-060	Reporting Occurrences and Processing Operations Information
		Special Provision SP-5	On Site Services
	Construction Safety	PRC-PRO-CN-14990	Construction Management
1		PRC-PRO-WKM-079	Job Hazard Analysis
		PRC-PRO-SH-40078	Contract Safety Processes
		PRC-PRO-WKM-12115	Work Management
2	Fire Protection	SDD J3-19	Fire and Emergency Response Services

Rule Section		CHPRC Management System Documents/Process	
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		SDD J3-20	Fire & Emergency Response Services – System Maintenance
		MSC-RD-8589	Hanford Fire Marshal Permits
		PRC-STD-FP-40404	Fire Protection Program
		PRC-PRO-EM-7647	Emergency Preparedness Program Requirements
		PRC-PRO-SH-40078	Contractor Safety Processes
	Explosives Safety	PRC-STD-FP-40404	Fire Protection Program
3		MSC-RD-11227	Use of Explosives on the Hanford Site
		PRC-PRO-SH-40078	Contractor Safety Processes
4	Pressure Safety	PRC-STD-EN-52736	Design, Inspection, Testing and Repair of ASME-Coded Pressure Systems and Safety Relief Devices
		PRC-PRO-SH-40078	Contractor Safety Processes
5	Firearms Safety	PRC-PRO-SH-40078	Contractor Safety Processes
	Industrial Hygiene	PRC-PRO-PM-24889	Project Initiation and Execution
		PRC-PRO-SH-409	Industrial Hygiene Monitoring, Reporting and Records Management
		PRC-PRO-SH-52755	Employee Job Task Analysis
		PRC-STD-SH-40518	Personal Protection
6		PRC-PRO-SH-40479	Occupational Noise Exposure and Hearing Conservation
		PRC-PRO-SH-17916	Industrial Hygiene Exposure Assessments
		DOE-0352	Hanford Site Respiratory Protection Program
		DOE-0342	Hanford Site Chronic Beryllium Disease Prevention Program
		PRC-PRO-SH-40078	Contractor Safety Processes
7	Biological Safety	PRC-PRO-SH-40078	Contractor Safety Processes

Rule Section		CHPRC Management System Documents/Process	
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		DOE-0352	Hanford Site Respiratory Protection Program
		MOA-HPMC-CHPRC- 2013	MOA between the HPMC OMS and CHPRC
		PRC-PRO-SH-52755	Employee Job Task Analysis
	Occupational Medicine	PRC-PRO-HR-021	Staffing
		PRC-PRO-HR-035	Termination of Employment
		DOE-0342	Hanford Site Chronic Beryllium Disease Prevention Program
		PRC-PRO-HR-073	Personal Time Bank and Other Absences
		PRC-PRO-HR-048	Reasonable Accommodations to Work Restrictions
8		PRC-PRO-SH-077	Reporting, Investigating, and Managing Health, Safety and Property/Vehicle Events
		PRC-PRO-HR-042	Fitness for Duty
		PRC-STD-FP-40404	Fire Protection Program
		PRC-PRO-SH-40479	Occupational Noise Exposure and Hearing Conservation
		PRC-PRO-HR-693	Return to Work from Personal Medical-Related Absence or Other Leave of Absence
		CHPRC Prime Contract	Interface Matrix - OMSP
		Special Provision SP-5	On Site Services
		PRC-PRO-SH-40078	Contractor Safety Processes
9	Motor Vehicle Safety	PRC-POL-SH-54212	Vehicle Safety Policy
		MSC-RD-27562	Commercial Driver License Holder's Drug & Alcohol Testing Requirements
		MSC-PRO-37561	Department of Transportation Federal Motor Carrier Requirements for Personnel
		PRC-PRO-TP-166	Transportation and Packaging Training

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		SDD J3-37	Motor Carrier Services
		SDD J3-39	Railroad Services
		PRC-PRO-SH-40078	Contractor Safety Processes
10	Electrical Safety	DOE-0359	Hanford Site Electrical Safety Program
		PRC-STD-SH-40518	Personal Protection
		DOE-0336	Hanford Site Lockout/Tagout Procedure
		SDD J3-41	Electrical Transmission, Distribution, & Energy Mgmt
		PRC-PRO-SH-40078	Contractor Safety Processes
11	Nanotechnology Safety - Reserved	N\A	
12	Workplace Violence Prevention - Reserved	N\A	

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Appendix C - Contractor Safety and Health

The 10 CFR 851, CHPRC Worker Safety and Health Program Description, covers CHPRC contracted work scope at any tier based upon the nature and duration of the work performed.

10 CFR 851, the Rule, applies to all construction work and services such as consultant, professional services, staff augmentation, etc. that is in the furtherance of the DOE mission.

10 CFR 851 does not apply to vendors or suppliers coming into CHPRC workspaces who do not have service contracts and who engage in no more than incidental work related to delivery, installation or repair of the products provided.

10 CFR 851 occupational medicine requirements apply to CHPRC contracted work scope at any tier if they are conducting CHPRC work scope on the Hanford Site.

CHPRC uses standard terms and conditions to flow down the applicable requirements of the CHPRC Worker Safety and Health Program. These requirements are specifically embedded in the SP-5 *On Site Services* and PRC-PRO-AC-40471, *Contract Labor Resources*, Section 3.0 and 6.0. These terms and conditions reflect requirements consistent with the Rule, Subpart C. The standard terms and conditions are contractually binding and delineate corporate and personnel safety roles and responsibilities of CHPRC contractor at all tiers.

CHPRC has processes and procedures to screen contract Request for Proposal submittals to evaluate safety attributes (i.e., injury rates, Workers Compensation Experience Modification Rate, and OSHA Inspection history) and ensure the hazards associated with the contracted activity are properly addressed and meet the Rule's requirements. Depending on the scope of work and its complexity, offerors may be required to submit a safety plan for a specific hazard or activity which will then be reviewed and approved as part of the contracting process.

CHPRC monitors the winning offeror's compliance with the worker safety and health program through routine safety inspections and reporting and tracking systems for non-compliance issues. These processes include contractor and contractor employee involvement. Safety and health non-compliance issues that cannot be immediately corrected are placed in a safe configuration until the issues can be resolved and corrective actions implemented.